

Questions for Keystone – 6/17/2014

Data provided on 5/16/2014

1. We identified a couple discrepancies between the RL and dilution factor values reported in the analytical spreadsheet, when compared to the RL and dilution factor values cited in the lab report for total mercury (see Table 1). Please confirm which RL and dilution factor is correct for these data samples. The RLs for these two samples are reported as identical in the two laboratory reports; however, the laboratory reports have a 500-fold difference in the reported dilution factor.

Table 1. Dilution Factor Discrepancies between Analytical Spreadsheet and Lab Reports for Mercury

Date	Units	Amount	MDL	RL (from Spreadsheet)	RL (from Lab Report)	DF (from Spreadsheet)	DF (from Lab Report)	Sample Point
6-Jan-14	mg/L	0.52	0.0005	0.001	0.1	5	500	FGD Influent (SP-1)
13-Jan-14	mg/L	0.505	0.0005	0.001	0.1	5	1	FGD Influent (SP-1)

Original data submitted on 2/21/2014:

2. Two separate lab reports were provided for FGD influent mercury results associated with samples collected on 4/10/2012. The laboratory report provided in NRG Energy's original submission includes a FGD influent mercury result of 0.0013 mg/L, which is not included in the analytical data table; and the laboratory report provided in the additional data submission on 5/16/14 includes a mercury result of 650 ug/L, which is included in the analytical data table. The data table also includes a FGD influent mercury result of 0.66 mg/L for 4/10/2012. Please provide a laboratory report verifying this result. Additionally, please explain why 0.0013 mg/L is not included in the analytical data table.
3. We identified several discrepancies between the dilution factor (DF) values reported in the analytical spreadsheet compared to the cited dilution factors in the lab reports for the mercury results (see Table 2). Please confirm which dilution factor is correct for these data samples.

Table 2. Dilution Factor Discrepancies between Analytical Spreadsheet and Lab Reports for Mercury

Date	Non-Detect Indicator	Units	Amount	MDL	RL	DF (from Spreadsheet)	DF (from Lab Report)	Sample Point
03-Jan-12	D	mg/L	0.54	0.05	0.1	1	500	FGD Influent (SP-1)
10-Jan-12	D	mg/L	0.49	0.05	0.1	1	500	FGD Influent (SP-1)
17-Jan-12	D	mg/L	0.66	0.05	0.1	1	500	FGD Influent (SP-1)
24-Jan-12	D	mg/L	0.15	0.05	0.1	1	500	FGD Influent (SP-1)
31-Jan-12	D	mg/L	0.57	0.05	0.1	1	500	FGD Influent (SP-1)

Table 2. Dilution Factor Discrepancies between Analytical Spreadsheet and Lab Reports for Mercury

Date	Non-Detect Indicator	Units	Amount	MDL	RL	DF (from Spreadsheet)	DF (from Lab Report)	Sample Point
07-Feb-12	D	mg/L	0.69	0.05	0.1	1	500	FGD Influent (SP-1)
14-Feb-12	D	mg/L	0.17	0.05	0.1	1	500	FGD Influent (SP-1)
21-Feb-12	D	mg/L	0.33	0.05	0.1	1	500	FGD Influent (SP-1)
28-Feb-12	D	mg/L	0.66	0.05	0.1	1	500	FGD Influent (SP-1)
06-Mar-12	D	mg/L	0.38	0.05	0.1	1	500	FGD Influent (SP-1)
13-Mar-12	D	mg/L	0.6	0.05	0.1	1	500	FGD Influent (SP-1)
20-Mar-12	D	mg/L	0.66	0.05	0.1	1	500	FGD Influent (SP-1)
27-Mar-12	D	mg/L	0.49	0.05	0.1	1	500	FGD Influent (SP-1)
03-Apr-12	D	mg/L	0.16	0.05	0.1	1	500	FGD Influent (SP-1)
10-Apr-12	D	µg/L	650	50	100	1	500	FGD Influent (SP-1)
17-Apr-12	ND	mg/L		0.05	0.1	1	500	FGD Influent (SP-1)
25-Apr-12	D	mg/L	0.89	0.05	0.1	1	500	FGD Influent (SP-1)
01-May-12	D	mg/L	0.95	0.05	0.1	1	500	FGD Influent (SP-1)
08-May-12	D	mg/L	0.4	0.05	0.1	1	500	FGD Influent (SP-1)
15-May-12	D	mg/L	0.25	0.05	0.1	1	500	FGD Influent (SP-1)
23-May-12	D	mg/L	0.64	0.05	0.1	1	500	FGD Influent (SP-1)
29-May-12	D	mg/L	0.82	0.05	0.1	1	500	FGD Influent (SP-1)
05-Jun-12	D	mg/L	0.64	0.05	0.1	1	500	FGD Influent (SP-1)
12-Jun-12	D	mg/L	0.73	0.05	0.1	1	500	FGD Influent (SP-1)
20-Jun-12	D	mg/L	0.54	0.05	0.1	1	500	FGD Influent (SP-1)
26-Jun-12	D	mg/L	0.14	0.05	0.1	1	500	FGD Influent (SP-1)
03-Jul-12	D	mg/L	0.745	0.05	0.1	1	500	FGD Influent (SP-1)
10-Jul-12	D	mg/L	0.89	0.05	0.1	1	500	FGD Influent (SP-1)
17-Jul-12	D	mg/L	0.66	0.05	0.1	1	500	FGD Influent (SP-1)
24-Jul-12	D	mg/L	0.835	0.05	0.1	1	500	FGD Influent (SP-1)
31-Jul-12	D	mg/L	0.362	0.05	0.1	1	500	FGD Influent (SP-1)
07-Aug-12	D	mg/L	0.114	0.05	0.1	1	500	FGD Influent (SP-1)
14-Aug-12	D	mg/L	0.59	0.05	0.1	1	500	FGD Influent (SP-1)
21-Aug-12	D	mg/L	0.264	0.05	0.1	1	500	FGD Influent (SP-1)
28-Aug-12	D	mg/L	0.535	0.05	0.1	1	500	FGD Influent (SP-1)
28-Aug-12	ND	mg/L		0.001		1	5	Outfall 101 (SP-2)
05-Sep-12	D	mg/L	0.67	0.05	0.1	1	500	FGD Influent (SP-1)
11-Sep-12	D	mg/L	0.465	0.05	0.1	1	500	FGD Influent (SP-1)
18-Sep-12	ND	mg/L		0.05	0.1	1	500	FGD Influent (SP-1)
24-Oct-12	D	mg/L	0.418	0.05	0.1	1	500	FGD Influent (SP-1)
30-Oct-12	D	mg/L	0.79	0.05	0.1	1	500	FGD Influent (SP-1)

Table 2. Dilution Factor Discrepancies between Analytical Spreadsheet and Lab Reports for Mercury

Date	Non-Detect Indicator	Units	Amount	MDL	RL	DF (from Spreadsheet)	DF (from Lab Report)	Sample Point
07-Nov-12	D	mg/L	0.77	0.05	0.1	1	500	FGD Influent (SP-1)
12-Nov-12	D	mg/L	0.364	0.05	0.1	1	500	FGD Influent (SP-1)
19-Nov-12	D	mg/L	0.481	0.05	0.1	1	500	FGD Influent (SP-1)
26-Nov-12	D	mg/L	0.109	0.05	0.1	1	500	FGD Influent (SP-1)
03-Dec-12	D	mg/L	0.308	0.05	0.1	1	500	FGD Influent (SP-1)
05-Dec-12	D	mg/L	0.242	0.05	0.1	1	500	FGD Influent (SP-1)
12-Dec-12	D	mg/L	0.333	0.05	0.1	1	500	FGD Influent (SP-1)
17-Dec-12	D	mg/L	0.308	0.05	0.1	1	500	FGD Influent (SP-1)
26-Dec-12	D	mg/L	0.585	0.05	0.1	1	500	FGD Influent (SP-1)
02-Jan-13	ND	mg/L		0.05	0.1	1	500	FGD Influent (SP-1)
07-Jan-13	D	mg/L	0.43	0.05	0.1	1	500	FGD Influent (SP-1)
14-Jan-13	D	mg/L	0.615	0.05	0.1	1	500	FGD Influent (SP-1)
21-Jan-13	ND	mg/L		0.05	0.1	1	500	FGD Influent (SP-1)
29-Jan-13	D	mg/L	0.705	0.05	0.1	1	500	FGD Influent (SP-1)
05-Feb-13	D	mg/L	0.54	0.05	0.1	1	500	FGD Influent (SP-1)
11-Feb-13	D	mg/L	0.178	0.05	0.1	1	500	FGD Influent (SP-1)
18-Feb-13	D	mg/L	0.191	0.05	0.1	1	500	FGD Influent (SP-1)
25-Feb-13	D	mg/L	0.545	0.05	0.1	1	500	FGD Influent (SP-1)
04-Mar-13	D	mg/L	0.375	0.05	0.1	1	500	FGD Influent (SP-1)
11-Mar-13	D	mg/L	0.625	0.05	0.1	1	500	FGD Influent (SP-1)
19-Mar-13	D	mg/L	0.63	0.05	0.1	1	500	FGD Influent (SP-1)
25-Mar-13	D	mg/L	0.109	0.05	0.1	1	500	FGD Influent (SP-1)
01-Apr-13	D	mg/L	0.52	0.05	0.1	1	500	FGD Influent (SP-1)
09-Apr-13	D	mg/L	0.585	0.05	0.1	1	500	FGD Influent (SP-1)
15-Apr-13	D	mg/L	0.26	0.05	0.1	1	500	FGD Influent (SP-1)
22-Apr-13	D	mg/L	0.351	0.05	0.1	1	500	FGD Influent (SP-1)
29-Apr-13	D	mg/L	0.408	0.05	0.1	1	500	FGD Influent (SP-1)
06-May-13	D	mg/L	0.153	0.05	0.1	1	500	FGD Influent (SP-1)
13-May-13	D	mg/L	0.835	0.05	0.1	1	500	FGD Influent (SP-1)
20-May-13	D	mg/L	0.9	0.05	0.1	1	500	FGD Influent (SP-1)
28-May-13	D	mg/L	0.203	0.05	0.1	1	500	FGD Influent (SP-1)
03-Jun-13	D	mg/L	0.75	0.05	0.1	1	500	FGD Influent (SP-1)
10-Jun-13	D	mg/L	0.278	0.05	0.1	1	500	FGD Influent (SP-1)
22-Jun-13	D	mg/L	0.78	0.05	0.1	1	500	FGD Influent (SP-1)
26-Jun-13	D	mg/L	0.178	0.05	0.1	1	500	FGD Influent (SP-1)
01-Jul-13	D	mg/L	0.925	0.05	0.1	1	500	FGD Influent (SP-1)

Table 2. Dilution Factor Discrepancies between Analytical Spreadsheet and Lab Reports for Mercury

Date	Non-Detect Indicator	Units	Amount	MDL	RL	DF (from Spreadsheet)	DF (from Lab Report)	Sample Point
08-Jul-13	D	mg/L	0.77	0.05	0.1	1	500	FGD Influent (SP-1)
15-Jul-13	D	mg/L	0.79	0.05	0.1	1	500	FGD Influent (SP-1)
22-Jul-13	D	mg/L	0.31	0.05	0.1	1	500	FGD Influent (SP-1)
29-Jul-13	D	mg/L	0.85	0.05	0.1	1	500	FGD Influent (SP-1)
05-Aug-13	ND	mg/L		0.05	0.1	1	500	FGD Influent (SP-1)
12-Aug-13	D	mg/L	0.625	0.05	0.1	1	500	FGD Influent (SP-1)
19-Aug-13	D	mg/L	0.153	0.05	0.1	1	500	FGD Influent (SP-1)
26-Aug-13	D	mg/L	0.93	0.05	0.1	1	500	FGD Influent (SP-1)
03-Sep-13	D	mg/L	0.945	0.05	0.1	1	500	FGD Influent (SP-1)
09-Sep-13	D	mg/L	0.431	0.05	0.1	1	500	FGD Influent (SP-1)
16-Sep-13	D	mg/L	0.432	0.05	0.1	1	500	FGD Influent (SP-1)
23-Sep-13	D	mg/L	0.56	0.05	0.1	1	500	FGD Influent (SP-1)
30-Sep-13	D	mg/L	0.214	0.05	0.1	1	500	FGD Influent (SP-1)
07-Oct-13	D	mg/L	0.436	0.05	0.1	1	500	FGD Influent (SP-1)
14-Oct-13	D	mg/L	0.327	0.05	0.1	1	500	FGD Influent (SP-1)
21-Oct-13	D	mg/L	0.334	0.05	0.1	1	500	FGD Influent (SP-1)
28-Oct-13	D	mg/L	0.117	0.05	0.1	1	500	FGD Influent (SP-1)
04-Nov-13	D	mg/L	0.106	0.05	0.1	1	500	FGD Influent (SP-1)
11-Nov-13	D	mg/L	0.414	0.05	0.1	1	500	FGD Influent (SP-1)
18-Nov-13	D	mg/L	0.52	0.05	0.1	1	500	FGD Influent (SP-1)
25-Nov-13	D	mg/L	0.59	0.05	0.1	1	500	FGD Influent (SP-1)
02-Dec-13	D	mg/L	0.65	0.05	0.1	1	500	FGD Influent (SP-1)
09-Dec-13	D	mg/L	0.288	0.05	0.1	1	500	FGD Influent (SP-1)
16-Dec-13	D	mg/L	0.735	0.05	0.1	1	500	FGD Influent (SP-1)
23-Dec-13	D	mg/L	0.126	0.05	0.1	1	500	FGD Influent (SP-1)